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FEDERAL COMMUNICATIONS COMMISSION
UNITED STATES GOVERNMENT
OFFICE OF THE SECRETARY

MEMORANDUM

Date : June 16, 1993

Reply to
Attn of : John R. Winston
Director, OSBA

Subject : SBAC Public Hearing Record

To : Donna Searcy
Secretary

The enclosed documents were received by the Small Business Advisory Committee (SBAC) during its recent May 27, 1993 quarterly meeting and public hearing. They are being forwarded to your office for official inclusion in the public record. In all cases these documents are in reference to FCC General Docket # 90-314 (PCS) and General Docket # 92-51 (Broadcast Capital Formation). All documents are clearly marked as to the referenced Docket #.

If you have any questions or require additional information, please contact me on 632-1571.



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During the last 12 twelve years, under three successive Republican administrations, the First Amendment rights of minorities have been eroded. The telecommunications industry is evolving at a phenomenal pace, but minorities have not been a part of that phenomenal growth. As new telecommunications services are being developed to merge information and message transmission with the delivery of entertainment services, the minority ownership policies have been limited in their applicability solely to traditional mass media services. It is clear however that, if minorities are to have a viable means of exercising their first Amendment rights, they must be involved in all aspects of the telecommunications industry, not just traditional mass media services.

The distinctive lines which have historically separated companies and the services they provide into the broadcast, cable television and common carrier areas are being rapidly erased. In the 21st century, traditional telephone companies will be providing information and entertainment services over common carrier facilities, and traditional cable television companies will be providing voice and data transmission services over cable television facilities. The lines will soon be non-existent between the services provided by: personal communication services, wireless cable, fiber optics, cable direct broadcast satellites, satellite

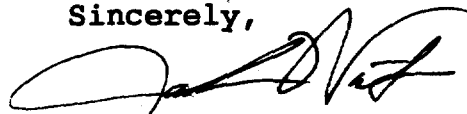
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4. Expansion of the membership of the Small Business Advisory Committee such that it becomes more representative of the minority and other constituencies the Commission claimed it was establishing the Committee to serve.
5. Broader uses of the tax certificate. (See the Petition for Rulemaking of the Ad Hoc Committee on the Tax Certificate.)
6. Maintain the integration criterion as currently applied in the comparative hearing process. The Commission must avoid revising the treatment of the integration criterion in comparative hearings in a manner which will undercut the viability of the minority ownership policies upheld by the Supreme Court in Metro Broadcasting.

We hope that you will give these proposals serious consideration and continue to include NABOB in the development of Commission policies.

Sincerely,



James L. Winston
Executive Director and
General Counsel

JLW/kn

cc: Commissioner Andrew C. Barrett
Commissioner Ervin S. Duggan
Mr. Joshua Smith
Mr. John Winston